

Sirs;

Earlier this year, we had a meeting with Grand River Mutual Telephone Cooperation, our local telephone provider regarding our telephone service. They stated that there is a “rural call completion” problem that they are powerless to address. Succinctly, calls intended for rural customers never get to the rural carrier.

A description of problem:

http://www.michigan.gov/documents/mpsc/rural_call_373366_7.pdf

The best advice is to complain. Really???

As a co-owner of a major business (relatively) in a small community, we are sensitive that our payroll affects the entire community. In this economic environment and following our layoffs, every customer is very precious. While we fight for existence, to lose customers over a utility that should be as reliable as electricity is painful.

Business profits along with the lack of enforcement of existing FCC Regulations is the motivation for carriers to not complete calls.

FCC 2007 Declaratory Ruling and Order DA 07-2863 was issued to address the problem. With blatant disregard for this ruling, carriers did not just continue, but increased the practices that create this issue. The FCC reports between April 2010 and March 2011 the reports increased 2000% (FCC DA 12-154 footnote 17).

On January 18, 2012, 24 Senators sent a letter to FCC Chairman Julius Genachowski urging action. FCC responds with Declarative Ruling DA 12-154 in February 6, 2012. It is full of statement such as “we remind Carriers”, “we also make clear”, “The Commission has stated”, “again emphasized”, “We clarify” ... etc. It mostly reiterates regulation that a carrier should already know; restating and expanding on the 2007 Ruling.

Also included in the 2012 Ruling is “a transition to gradually reduce most termination charges”. The FCC is hoping that this will motivate the carriers that have created this problem will behave differently. Unless rural carriers are charging excessively, this punishes the rural carrier, a victim, while rewarding perpetrator of the problem.

If the current FCC Regulations were followed, there would be no issue. With the issuance of the 2007 Ruling, compliance significantly decreased. The 2012 Ruling is a repetitive weak act that punishes rural carriers. We need the FCC to enforce existing rulings of known violations and actively monitor compliance.

This is an economic issue and the solution is simple. The cost of connecting a call must be less than not connecting the call. To accomplish this, punitive action must occur. The FCC has the authority (and I assert the duty) to issue cease-and-desist orders, forfeitures and license revocations as outlined in the Communication Act of 1934. Done in a public way, this will alleviate the problem.

How can we get the FCC to enforce known violation?

Further, the FCC has become very efficient at taking complaints with a web-based complaint intake system. With tens of thousands of complaints over many years, I am unaware of any enforcement. Their request to report calls that I am not getting (an interesting task) and add these to the tens of thousands of complaints using their efficient web-based complaint intake system seems pointless.

We suffer daily. Please help.

Sincerely,
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